SIKELELA TECH (PTY) LTD

Registration No. 2026/522938/07

PAIA MANUAL

in terms of section 51 of the

Promotion of Access to Information Act, 2 of 2000 (as amended)

read with the Protection of Personal Information Act, 4 of 2013

For the personal budgeting and expense-tracking application operated under the name **"Track Spend"**

Date of compilation: 14 July 2026

Date of latest revision: 14 July 2026

Information Regulator organisation registration no. 2026-062072

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1. List of acronyms and abbreviations

"CEO"	Chief Executive Officer
"DIO"	Deputy Information Officer
"IO"	Information Officer
"Minister"	Minister of Justice and Correctional Services
"PAIA"	Promotion of Access to Information Act, No. 2 of 2000 (as amended)
"POPIA"	Protection of Personal Information Act, No. 4 of 2013
"Regulator"	Information Regulator (South Africa)
"Republic"	Republic of South Africa
"Track Spend"	The personal budgeting and expense-tracking application operated by SIKELELA TECH (Pty) Ltd

2. Purpose of this PAIA Manual

This Manual is compiled in accordance with section 51 of PAIA and serves as a guide for members of the public who wish to exercise their right of access to the records held by SIKELELA TECH (Pty) Ltd ("the Company"). It is useful to the public to:

- check the categories of records held by the Company which are available without a person having to submit a formal PAIA request;
- have a sufficient understanding of how to make a request for access to a record of the Company, by providing a description of the subjects on which the Company holds records and the categories of records held on each subject;
- know the description of the records of the Company which are available in accordance with any other legislation;
- access the contact details of the Information Officer who will assist the public with the records they intend to access;
- know the description of the Guide on how to use PAIA, as updated by the Regulator, and how to obtain access to it;
- know that the Company processes personal information, the purpose of that processing, and the description of the categories of data subjects and of the information relating thereto;
- know the recipients or categories of recipients to whom the personal information may be supplied;
- know whether the Company transfers or processes personal information outside the Republic and to whom it may be supplied; and
- know whether the Company has appropriate security measures in place to ensure the confidentiality, integrity and availability of the personal information which is processed.

3. Key contact details for access to information

3.1 Information Officer

Name	Ms Kaylin Klein

Designation	Information Officer (registered with the Information Regulator on 14 July 2026)
Cellphone	0646773281
Email	kaylin@track-spend.com
Postal address	Chandelle, Buh-rein Dr, Estate, 7570

3.2 Deputy Information Officer

If a Deputy Information Officer has been designated in terms of section 17(1) of PAIA, insert their details below; otherwise mark this section "Not applicable".

Name	Not Applicable
Telephone	Not Applicable
Email	Not Applicable

3.3 General access-to-information and head office contacts

Head of the Company	Kaylin Klein
General enquiries email	info@track-spend.com
Physical address	Chandelle, Buh-rein Dr, Estate, 7570
Postal address	Chandelle, Buh-rein Dr, Estate, 7570
Telephone	0646773281
Website / application	https://track-spend.com

4. Guide on how to use PAIA and how to obtain access to it

4.1 The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available a revised Guide on how to use PAIA ("the Guide") in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

4.2 The Guide is available in each of the official languages and in braille.

4.3 The Guide contains a description of, among other things: the objects of PAIA and POPIA; the contact details of the Information Officer and every Deputy Information Officer; the manner and form of a request for access to a record of a public and a private body; the assistance available from the Information Officer and from the Regulator; the remedies in law available regarding an act or failure to act in respect of a right or duty conferred by PAIA and POPIA (including the manner of lodging an internal appeal, a complaint to the Regulator, and a court application); the provisions requiring the compilation of a manual; the provisions for the voluntary disclosure of categories of records; the notices regarding fees payable; and the regulations made under section 92 of PAIA.

4.4 Members of the public may inspect or make copies of the Guide from the offices of public and private bodies, including the office of the Regulator, during normal working hours.

4.5 The Guide may also be obtained upon request to the Information Officer, and from the website of the Regulator at https://inforegulator.org.za.

5. Categories of records available without a person having to request access

The following categories of records are, or may be made, available without a person having to submit a formal PAIA request:

Category of records	Types of record	On website / in app	On request
Product information	Feature descriptions, subscription plans and pricing, FAQs	Yes	Yes
Legal and policy documents	Terms of Service, Privacy Policy, Cookie Policy, this PAIA Manual	Yes	Yes
Support material	Help articles, user guides, contact form	Yes	Yes
Marketing material	Public blog posts, newsletters, social media content	Yes	No

6. Records available in accordance with other legislation

The Company holds and maintains records in accordance with, amongst others, the legislation listed below:

Category of records	Applicable legislation
Memorandum of Incorporation, share register and statutory records	Companies Act, 71 of 2008
Financial statements, accounting records and tax records	Tax Administration Act, 28 of 2011; Income Tax Act, 58 of 1962; Value-Added Tax Act, 89 of 1991; Companies Act, 71 of 2008
Records of personal-information processing; this PAIA Manual	Protection of Personal Information Act, 4 of 2013; Promotion of Access to Information Act, 2 of 2000
Electronic transaction and communication records	Electronic Communications and Transactions Act, 25 of 2002
Consumer and subscription records (where applicable)	Consumer Protection Act, 68 of 2008

7. Subjects and categories of records held by the Company

Subject on which records are held	Categories of records
Corporate governance & statutory	Memorandum of Incorporation, resolutions, share register and statutory records
Finance & tax	Financial statements, accounting records, invoices and tax returns

Track Spend users – identity & account	Account registration and profile data, authentication records, subscription and billing records, support correspondence
Financial statement metadata	Metadata of uploaded bank statements (file name, type, month, transaction count, totals, processing status). Raw statement files are not retained.
Transaction records	Categorised transaction data, including transaction date, category, anomaly indicators, merchant name and amount (encrypted at rest), the original bank description and a de-duplication hash
Budgeting	Per-category budgets and limits, savings-goal names, targets and amounts saved, and cached AI budgeting recommendations
AI chat assistant	History of chat messages exchanged with the AI assistant, with timestamps, and budget-state context snapshots
Personalisation	User-defined rules mapping merchant names to spending categories
Service providers & operators	Agreements with hosting, database, AI and payment operators, and non-disclosure agreements
Information & data protection	This PAIA Manual, privacy and security policies, and records of processing activities

8. Processing of personal information

8.1 Purpose of processing personal information

The Company processes personal information in order to: create and administer user accounts for the Track Spend application; deliver, maintain and improve the application and its budgeting and expense-tracking features; parse bank-statement files uploaded by users in order to extract and categorise transactions; generate automated insights, categorisation and an AI chat assistant; process subscription payments; provide customer and technical support; secure the application and prevent fraud and abuse; and comply with the Company's legal, regulatory, accounting and tax obligations.

8.2 Categories of data subjects and the information processed

The only data subjects whose personal information is processed within the Track Spend application are its **registered end users (account holders)**. The application does not process the personal information of employees, minors or other third parties.

Category of records	Personal information that may be processed
Identity & authentication	Email address; account password (hashed by the authentication provider – the application never has access to the plaintext password) or, where the user signs in with Google, the associated Google identity; user identifier (UUID); and account created, updated and last-sign-in timestamps
Subscription & billing	Subscription tier and status, billing-period end date and cancellation flag; payment-provider linkage identifiers (customer code, subscription code and email token); chat-usage counters; and processed payment webhook event identifiers. No card or bank-

	account credentials are stored – payment data is handled by the payment provider and the application retains only opaque tokens.
Financial statement metadata	Uploaded file name and type (CSV / PDF / XLSX), statement month, transaction count, total amount and processing status. The raw statement file itself is not stored – it is parsed in memory and then discarded.
Transaction detail	Transaction date, assigned category, anomaly indicator and confidence score; merchant name and amount (each encrypted at rest using AES-256-GCM); the original bank transaction description; and a de-duplication hash.
Budgeting	Per-category budgets and limits; savings-goal names, targets and amounts saved; and cached AI budgeting recommendations.
AI chat assistant	The full history of chat messages exchanged with the AI assistant, with timestamps, together with a snapshot of the user's budget state used as context.
Personalisation	Merchant names mapped to the spending categories chosen by the user, reflecting the user's categorisation preferences.

Although the financial information processed by Track Spend is not "special personal information" as defined in section 26 of POPIA, the Company recognises that it is highly sensitive in nature and applies heightened technical safeguards to protect it.

8.3 Recipients or categories of recipients to whom personal information may be supplied

Personal information may be supplied to the following operators (processors) and other recipients:

Recipient / operator	Location	Role
Supabase	European Union	Authentication services and hosting of the Postgres database
OpenAI (gpt-4o)	United States	Parsing of bank-statement text and generation of insights and AI chat responses
Paystack	South Africa	Processing of subscription payments
Vercel	United States	Application hosting and analytics
Regulators, law-enforcement, SARS and courts	–	Where required by law or to establish, exercise or defend a right

8.4 Trans-border (cross-border) flows of personal information

The Company processes certain personal information outside the Republic of South Africa through the operators listed below. These transfers are effected in accordance with section 72 of POPIA, on the bases set out in the table:

Operator	Country	Transfer basis under POPIA
Supabase	European Union	Recipient located in a jurisdiction recognised as providing an adequate level of data protection

OpenAI	United States	Data-subject consent, together with a binding operator (processing) agreement
Vercel	United States	Binding operator (processing) agreement and, where applicable, data-subject consent
Paystack	South Africa	Domestic – no cross-border transfer of personal information

8.5 Security measures to protect personal information

The Company has implemented reasonable technical and organisational measures, appropriate to the risks presented by its processing, to secure the integrity and confidentiality of personal information and to prevent its loss, damage, unauthorised destruction, and unlawful access or processing. These measures include, amongst others:

- account passwords are hashed by the authentication provider and are never accessible to the application in plaintext; sign-in with Google (OAuth) is supported as an alternative;
- sensitive transaction fields – merchant name and amount – are encrypted at rest using AES-256-GCM;
- uploaded bank-statement files are not retained: they are parsed in memory and immediately discarded, and the Company operates no statement-file storage;
- no card or bank-account credentials are stored by the application; all payment data is handled by the payment provider;
- personal information is transmitted over encrypted connections (HTTPS/TLS);
- access to production systems and the database is restricted and controlled; and
- operators that process personal information on the Company's behalf are bound by written agreements requiring them to maintain adequate security safeguards.

8.6 Retention and deletion of personal information

Personal information relating to a user is retained for the lifetime of that user's account. A user may delete their account at any time; on deletion, the removal cascades across all database tables keyed to that user, permanently purging their identity, statement metadata, transactions, budgets, savings goals, chat history and personalisation data. This gives effect to the user's right to have their personal information deleted on withdrawal of consent or when it is no longer required, as contemplated in POPIA. Certain company financial, tax and statutory records are retained for the periods required by the legislation referred to in section 6 above.

9. Availability of the Manual

9.1 A copy of this Manual is available:

- on the Company's website / within the Track Spend application at **[insert URL]**, if any;
- at the head office of the Company for public inspection during normal business hours;
- to any person upon request and upon payment of a reasonable prescribed fee; and
- to the Information Regulator upon request.

9.2 A fee for a copy of the Manual, as contemplated in Annexure B of the Regulations, is payable per each A4-size photocopy made.

10. Updating of the Manual

The head of SIKELELA TECH (Pty) Ltd will, on a regular basis, review and update this Manual as and when necessary to ensure that it remains accurate and current.

Issued by:

Ms Kaylin Klein - Information Officer

Date: 14 July 2026